

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter:	13
	:		
Daniel K. Palmer aka Daniel Kevin Palmer, Megan S. Palmer aka Megan Sue Palmer Debtors	:	Case No.	5:14-bk-02419-JJT
	:		
Nationstar Mortgage, LLC Movant	:	Document No.	Relief of stay
	:		
vs.	:		
Daniel K. Palmer aka Daniel Kevin Palmer, Megan S. Palmer aka Megan Sue Palmer Respondents	:	Judge John J. Thomas	

**ANSWER OF DEBTORS TO MOTION OF
NATIONSTAR MORTGAGE, LLC. FOR
RELIEF FROM AUTOMATIC STAY**

AND NOW COMES, the above Debtors by their attorneys, Doran & Doran, P.C. and responds to the Motion of Nationstar Mortgage LLC for relief of stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied in part. Although the Debtors admit that there is a post-petition mortgage delinquency, proof of the exact months and amounts owed are demanded.
7. Denied in part. Although the Debtors admit there is some post-petition arrearage, proof of the amount is demanded. The Debtors would like to go into a loan modification to resolve any arrears and make the home more affordable in the future.
8. Admitted.
9. Denied. It is denied that the amount of legal fees indicated is warranted.

10. Denied. The Debtors do not know what the allegations are referring to.

WHEREFORE, the Debtors requests that the Motion for relief be denied except to the extent necessary to allow the Movant and Debtors to negotiate a Loan Modification.

DORAN & DORAN, P.C.

BY: 

LISA M. DORAN, ESQUIRE

Attorneys for Debtors

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Dated: 5-11-2018

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Daniel K. Palmer aka Daniel Kevin Palmer,	:	Case No.	5:14-bk-02419-JJT
Megan S. Palmer aka Megan Sue Palmer	:		
Debtors	:		
	:		
Nationstar Mortgage, LLC	:	Document No.	
Movant	:		Relief of stay
vs.	:		
	:		
Daniel K. Palmer aka Daniel Kevin Palmer,	:		
Megan S. Palmer aka Megan Sue Palmer	:		
	:		
Respondents	:	Judge John J. Thomas	

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on 5-11-2018 a copy of the ***Response of Debtors to Motion of Nationstar Mortgage, LLC, for Relief from Automatic Stay*** is served electronically on the parties shown below upon filing:

James Warmbrodt, attorney for Nationstar Mortgage bkgroup@kmlawgroup.com

Charles J. DeHart, III, Trustee – dehartstaff@pamd13trustee.com, TFecf@pamd13trustee.com

United States Trustee - ustpregion03.ha.ecf@usdoj.gov

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 5-11-2018

Name: /s/ Lisa M. Doran
Doran & Doran, P.C.
69 Public Square – Ste 700
Wilkes Barre, PA 18702